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January 9, 2025

VIA CM/ECF

Hon. J. Paul Oetken
United States District Court, SDNY
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: Michael Saunders v. Loudpack Exotics Holdings, LLC

Dear Judge Oetken:

My office has been retained by the Defendant in the above matter.¹ More specifically, my office received this case on or about January 6, 2025. As a result, I have only recently been in communication with the Defendant. The case docket indicates an answer due date of December 30, 2024. I have conferred with Plaintiff's counsel, and in the interest of avoiding unnecessary default motion practice and in contemplation of settlement discussions, Plaintiff's counsel has graciously consented to an extension of Defendants' time to answer.

In light of the above, I respectfully request that the Court extend the Defendant's deadline to respond to the Complaint by 60 days to provide the parties the opportunity to engage in settlement discussion, and if necessary, to permit Defendant to conscientiously respond to the Complaint.

I have conferred with opposing counsel regarding the relief requested, and they join in this request.

I thank the Court for its courtesies in this matter.

¹ Pursuant to *Dicks v. Catholic Supply of St. Louis, Inc.* 2022 WL 1446229 at *1 (S.D.N.Y. October 25, 2022) (1:22-cv-7610-MKV), my filing of a notice of appearance does not constitute a waiver of a defense of personal jurisdiction, which Defendant has, and which Defendant expressly preserves.



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Respectfully submitted,

Very truly yours,

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